

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT United States Courts Southern
for the District of Texas
Southern District of Texas **FILED**

January 11, 2023

United States of America
v.
Bonifacio Salinas, Jr. (1992/US)

Nathan Ochsner, Clerk of Court

Case No. M-23-0062-M

*Defendant(s)***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 11, 2023 in the county of Kenedy in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

21 USC § 841

Possess with Intent to Distribute a Controlled Substance / Approximately 15 kilograms of cocaine, a Schedule II Controlled Substance.

21 USC § 846

Conspiracy to Possess with Intent to Distribute a Controlled Substance / Approximately 15 kilograms of cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

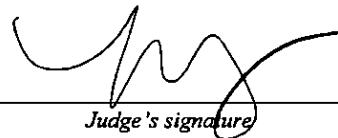
See Attachment "A"

☒ Continued on the attached sheet.

Approved by: AUSA Roberto Lopez, Jr.

/s/ Nicholas C. Stott*Complainant's signature*

Submitted by reliable electronic means, sworn to
and attested to telephonically per Fed. R. Cr. 4.1,
and probable cause found on:

Nicholas C. Stott HSI Special Agent*Printed name and title*Date: January 11, 2023 9:32 PM

*Judge's signature*City and state: McAllen, TXU.S. Magistrate Judge Nadia S. Medrano*Printed name and title*

Attachment "A"

1. On January 11, 2023, Border Patrol Agents (BPAs) detained Bonifacio Salinas, Jr. (hereinafter SALINAS), a citizen of the United States, the driver and sole occupant of a vehicle attempting to cross the Border Patrol checkpoint in Sarita, Texas with approximately 15 kilograms of a substance that field tested positive for cocaine concealed within an aftermarket constructed concealed compartment within the vehicle. As BPAs were attempting to access the aftermarket constructed concealed compartment in the vehicle, SALINAS attempted to flee on foot.
2. Homeland Security Investigations (HSI), Special Agents (SA) from McAllen, Texas responded to the Checkpoint to assist in the investigation. HSI SAs interviewed SALINAS who stated he was hired by an unknown person in Donna, Texas to smuggle illegal aliens from north of the Checkpoint to Houston, Texas. SALINAS stated he was to be paid an unknown amount for the smuggling venture. SALINAS stated he initially suspected there were drugs in the vehicle but was then told by an unidentified co-conspirator that there were no drugs in the vehicle. SALINAS stated he picked up the vehicle from an unknown location in Donna, Texas and was driving to Houston, Texas.